



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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November 7, 2011

Ms. Larissa Read
Gulf Islands National Seashore - GMP
National Park Service
Denver Service Center - Read
P.O. Box 25287
Denver, CO 80255

**SUBJECT: Gulf Islands National Seashore General Management Plan Draft
Environmental Impact Statement; CEQ# 20110293**

Dear Ms. Read,

Consistent with our responsibilities under Section 102(2)(C) of the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency (EPA) has reviewed the referenced National Park Service (NPS) Draft Environmental Impact Statement (DEIS) for the proposed update to the general management plan (GMP) for the Gulf Islands National Seashore (national seashore). The national seashore was established by Congress in 1971, and encompasses barrier islands and mainland areas in Florida and Mississippi. The last national seashore GMP was developed in 1978 and doesn't include boundary expansions such as areas of Cat Island and portions of Marsh Point near Davis Bayou and designated wilderness areas, Horn and Petit Bois Islands. In addition, environmental pressures such as increased development in the area and climate change have facilitated the need for an update to the GMP. The purpose of this NEPA action is to evaluate different management strategies being considered by the NPS for the new GMP for the national seashore.

The NPS evaluates four alternative management strategies under this DEIS. These management strategies include:

- **Alternative 1 (the no-action alternative)** - would continue the existing management and trends, including recovery efforts to reestablish the national seashore's programs and facilities that existed in 2004 before Hurricane Ivan. This alternative serves as a basis for comparison in evaluating the other alternatives.
- **Alternative 2** - would reduce the level of infrastructure rebuilt on the barrier islands and allow natural processes to predominate. The visitor experience would transition into a more primitive island experience, while mainland programs and services would be enhanced.
- **Alternative 3 (NPS preferred Alternative)** - would enhance visitor education, research, and resource protection opportunities throughout the national seashore.

- **Alternative 4** - would expand and diversify visitor opportunities throughout the national seashore by leveraging additional partnerships.

EPA has the following comments based on our review of the DEIS:

Alternatives:

In general, EPA is pleased with the detailed analysis of alternatives provided in the DEIS. The NPS identification of an environmentally preferred alternative and the overall preferred alternative allows EPA and other reviewers to better understand the direction the NPS is leaning for selection of an alternative for the FEIS. The NPS has identified Alternative 3 as both the environmentally preferred and the overall preferred alternative for this proposed action.

Under the section titled "Identification of the NPS Preferred Alternative" (p. 147) a process for selection of the preferred alternative was described. Five criteria were used to select the preferred alternative: 1) Provide Quality Visitor Opportunities; 2) Protect Wilderness Values; 3) Protect, Enhance, and Restore Gulf Coastal Ecosystems; 4) Provide Socioeconomic Benefits to Nearby Communities; and 5) Improve Efficiency of the NPS Operations. The selection of these factors and associated scoring system presented on p. 148 was not clearly explained in the DEIS. EPA recommends that the NPS provide additional clarification in the FEIS on how the five selecting criteria were chosen and details of how each alternative was scored. Providing the scoring for each criteria for each alternative would enhance this section in the FEIS.

The selection of the environmentally preferred alternative used a more subjective approach than the approach used to select the NPS preferred alternative. Specifically, a scoring system was used to select the NPS preferred alternative, but not the environmentally preferred alternative. EPA recommends additional discussion in the FEIS with respect the methodology used by the NPS for selection of the environmentally preferred alternative.

Priority Indicators and Standards:

Several standards or "thresholds" were selected to provide the NPS with feedback on effectiveness of management strategies for priority indicators (or user capacity indicators). For example, on p. 63 the NPS states "Park staff are already monitoring the number of shorebird mortalities along the Fort Pickens and Santa Rosa roadways and thus the standard of no more than 10 shorebird mortalities on these roadways every two weeks during nesting season (March through August) can be reliably tracked. This standard was chosen to reduce the impacts that speeding vehicles, pedestrians, and bicyclist have on shorebird mortalities. If the standard for this indicator is trending upward, seashore management can develop an educational program addressing the impacts of speeding on the roadway." We applaud the NPS's efforts to develop standards or thresholds that help evaluate the effectiveness of the management strategies, but we are somewhat unclear on how these standards or "thresholds" were developed. EPA recommends additional discussion in the FEIS regarding the development of these standards.

Cost:

Table 3 on p. 139 provides a detailed breakdown for the one-time cost associated with each proposed alternative, which is very helpful for the reader when evaluating the differences in cost

between the alternatives. Both one-time and annual operating cost totals are presented in Table 3. The annual operating cost presented in Table 3 varies depending on alternative. EPA assumes that the variation in annual operating cost between the alternatives is the difference in full-time equivalent (FTE) personnel needed, but this level of detail is not provided in the DEIS. EPA recommends that a detailed table, such as Table 2 - page 139, be developed for the annual operating cost for each alternative.

Emergency Response Activities – Deepwater Horizon Spill:

The NPS references deep cleaning of sand and beaches as part of oil spill response activities throughout the DEIS. EPA is comfortable with the NPS using this technique as a short-term activity to fully remove oil spill related materials, but sifting of beach material as a regular maintenance activity should be avoided. EPA is concerned that this type activity could break up microbial elements that help hold sand together, leading to greater erosion.

Environmental Justice and Public Outreach:

Under the Environmental Justice (EJ) section a public outreach effort is described. The NPS states on p. 249 that “The Park staff and planning team actively solicited public participation as part of the planning process and gave equal consideration to all input from persons regardless of age, race, income status, or other socioeconomic or demographic factors.” Given that areas close to the national seashore have Hispanic, Asian, and other diverse populations, the DEIS should include discussion regarding strategies used to meaningfully engage or outreach to these communities in the decision-making and assessment process (i.e., Spanish materials/translators provided during the public involvement process, etc).

Cumulative Impacts:

EPA is pleased that the NPS provided cumulative impact discussions in the context of each environmental impact area and each alternative. A common theme throughout the cumulative impact discussion was the Deepwater Horizon oil spill response activities. The Deepwater Horizon oil spill and subsequent response activities have had and will potentially continue to have a significant impact on present and foreseeable future conditions on most of the environmental resource areas discussed in the DEIS. EPA recommends that the NPS provide additional discussion and detail in the FEIS with regards to how the Deepwater Horizon oil spill and response activities will impact future environmental conditions of the national seashore and how these changes will impact the proposed general management strategies proposed by the NPS in the DEIS.

Resource Agency Coordination Efforts:

Chapter 5 (p. 372-373) provides an overview of NPS coordination with other Federal agencies, State agencies, and American Indian Tribes. EPA notes that documentation of these coordination efforts is not provided in the DEIS. In addition, it appears that there was no early coordination with the State Historic Preservation Officer (SHPO) regarding the proposed action, but it is stated that they will have an opportunity to review and comment on the DEIS. EPA recommends that the NPS provide actual correspondence and letters regarding other resource agencies positions on the proposed action if available. Lastly, EPA recommends earlier engagement of all resource agencies during the scoping period.

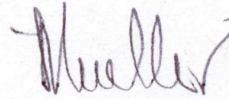
Editorial Note:

- Table 4: Summary of Impacts by Topic for Each Alternative - p. 166: Appears to be an incomplete sentence under Alternative 3 and description for impacts on special status species.

Although some clarification comments were offered for this DEIS, EPA supports the NPS selection of Alternative 3 as the preferred alternative, especially since it was also identified as the environmentally preferred alternative. Therefore, EPA rates this DEIS as "LO" (Lack of Objections). Nevertheless, we request that the NPS respond to our comments in a dedicated section of the FEIS.

We appreciate the opportunity to review the proposed action. Please contact Dan Holliman at (404) 562-9531 if you want to discuss our comments.

Sincerely,

A handwritten signature in purple ink, appearing to read "Mueller", with a stylized flourish at the end.

Heinz J. Mueller, Chief
NEPA Program Office
Office of Policy and Management

Enclosures

**U.S. ENVIRONMENTAL PROTECTION AGENCY
ENVIRONMENTAL IMPACT STATEMENT (EIS) RATING SYSTEM CRITERIA**

EPA has developed a set of criteria for rating Draft EISs. The rating system provides a basis upon which EPA makes recommendations to the lead agency for improving the draft.

RATING THE ENVIRONMENTAL IMPACT OF THE ACTION

- \$ LO (Lack of Objections): The review has not identified any potential environmental impacts requiring substantive changes to the preferred alternative. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposed action.
- \$ EC (Environmental Concerns): The review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact.
- \$ EO (Environmental Objections): The review has identified significant environmental impacts that should be avoided in order to adequately protect the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). The basis for environmental objections can include situations:
 - 1. Where an action might violate or be inconsistent with achievement or maintenance of a national environmental standard;
 - 2. Where the Federal agency violates its own substantive environmental requirements that relate to EPA's areas of jurisdiction or expertise;
 - 3. Where there is a violation of an EPA policy declaration;
 - 4. Where there are no applicable standards or where applicable standards will not be violated but there is potential for significant environmental degradation that could be corrected by project modification or other feasible alternatives; or
 - 5. Where proceeding with the proposed action would set a precedent for future actions that collectively could result in significant environmental impacts.
- \$ EU (Environmentally Unsatisfactory): The review has identified adverse environmental impacts that are of sufficient magnitude that EPA believes the proposed action must not proceed as proposed. The basis for an environmentally unsatisfactory determination consists of identification of environmentally objectionable impacts as defined above and one or more of the following conditions:
 - 1. The potential violation of or inconsistency with a national environmental standard is substantive and/or will occur on a long-term basis;
 - 2. There are no applicable standards but the severity, duration, or geographical scope of the impacts associated with the proposed action warrant special attention; or
 - 3. The potential environmental impacts resulting from the proposed action are of national importance because of the threat to national environmental resources or to environmental policies.

RATING THE ADEQUACY OF THE ENVIRONMENTAL IMPACT STATEMENT (EIS)

- \$ 1 (Adequate): The Draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.
- \$ 2 (Insufficient Information): The Draft EIS does not contain sufficient information to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the Draft EIS, which could reduce the environmental impacts of the proposal. The identified additional information, data, analyses, or discussion should be included in the Final EIS.
- \$ 3 (Inadequate): The Draft EIS does not adequately assess the potentially significant environmental impacts of the proposal, or the reviewer has identified new, reasonably available, alternatives, that are outside of the spectrum of alternatives analyzed in the Draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. The identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. This rating indicates EPA's belief that the Draft EIS does not meet the purposes of NEPA and/or the Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised Draft EIS.